

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

Civil Action No.  
03 MDL 1570 (GBD)(FM)

This document relates to:

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)

*Bauer et al. v. al Qaeda Islamic Army, et al.*, 02-cv-7236 (GBD)(SN)

*Burlingame v. Bin Laden, et al.*, 02-cv-7230 (GBD)(SN)

*Schneider et al. v. Islamic Republic of Iran*, 02-cv-7209 (GBD)(SN)

**PLAINTIFFS' NOTICE OF MOTION TO CLARIFY  
PLEADINGS FOR MULTIPLE-CAPACITY CLAIMS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the Declaration of Andrew J. Maloney with Exhibits A, B, C and D attached thereto, the plaintiffs identified on those exhibits respectfully move this Court pursuant to Fed. R. Civ. P. 15 and 17 for an Order permitting them to amend the caption of Plaintiffs' Sixth Amended Complaint to identify all capacities in which the "real parties in interest" have asserted claims in this case as permitted under Fed. R. Civ. P. 17. Exhibits A, B, C and D to the Declaration of Andrew J. Maloney identify those named plaintiffs who asserted claims in multiple capacities and seeks to modify to permit these additional claims to be explicitly set forth in the Court record dating back to when the real party in interest was added to this litigation. This motion does not seek to add the claims of any new real parties in interest but rather identifies the capacities in which these real parties in interest who are already named in Plaintiffs' Sixth Amended Complaint dated September 30, 2005. This motion seeks only to clarify for the Court all of those parties who have been engaged in this litigation either individually or which claims were pursued by a "real party in interest" under Fed. R. Civ. P. 17 dating to the filing of the Sixth Amended Complaint on September 30, 2005.

Dated: November 4, 2022

Respectfully submitted,

/s/

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